1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	Craig A. Newby (Nevada Bar No. 8591) McDONALD CARANO, LLP 2300 W. Sahara Ave., Ste. 1200 Las Vegas, NV 89102 Tel. (702) 873-4100 Fax (702) 873-9966 Email: cnewby@mcdonaldcarano.com John B. Sganga, Jr. (Admitted Pro Hac Vice) Sean M. Murray (Admitted Pro Hac Vice) Joshua Stowell (Admitted Pro Hac Vice) Justin J. Gillett (Admitted Pro Hac Vice) KNOBBE, MARTENS, OLSON & BEAR, LI 2040 Main Street, Fourteenth Floor Irvine, CA 92614 Phone: (949) 760-9502 Email: john.sganga@knobbe.com Email: sean.murray@knobbe.com Email: joshua.stowell@knobbe.com Email: justin.gillett@knobbe.com Attorneys for Plaintiff, JS Products, Inc.	FOLEY & OAKES, PC Daniel T. Foley (Nevada State Bar No. 1079) 626 So. 8th Street Las Vegas, NV 89101 Telephone: (702) 384-2070 Facsimile: (702) 384-2128 Email: Dan@foleyoakes.com BUETHER JOE & CARPENTER, LLC ERIC W. BUETHER (to be Admitted Pro Hac Vice) Email: Eric.Buether@BJCIPLaw.com CHRISTOPHER M. JOE (to be Admitted Pro Hac Vice) Email: Chris.Joe@BJCIPLaw.com MICHAEL D. RICKETTS (to be Admitted Pro Hac Vice) Email: Mickey.Ricketts@BJCIPLaw.com 1700 Pacific Avenue, Suite 4750 Dallas, Texas 75201 Telephone: (214) 466-1270 Facsimile: (214) 635-1842 Attorneys for Defendant, ROLLER CLUTCH TOOLS, LLC
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19	JS PRODUCTS, INC., a Nevada corporation,	Case No. 2:17-cv-02615-GMN-GWF
20	Plaintiffs,	STIPULATION REGARDING EXTENSION OF TIME TO RESPOND
21	v.	TO DEFENDANT'S MOTION TO DISMISS
22	ROLLER CLUTCH TOOLS, LLC, a California limited liability company,	(First Request)
23	Defendant.	(= 1
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Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Local Rules 6-1 and 6-2, Plaintiff JS Products, Inc. ("JS Products" or "Plaintiff") has requested, and Defendant Roller Clutch Tools, LLC ("Roller Clutch" or "Defendant") has agreed to, a one week extension of time, until **January 5**, **2018**, in which to file its Response to Defendant's Motion to Dismiss for Lack of Personal Jurisdiction Under Fed. R. Civ. P. 12(b)(2) and Improper Venue Under Fed. R. Civ. P. 12(b)(3). (ECF No. 30, "Motion"). This is the Parties' first request for an extension of the deadline to oppose the Motion. The Motion was originally filed on December 15, 2017 and the opposition is currently scheduled to be due on or before December 29, 2017.

Good cause exists for this Court to grant the extension because the Parties have reached an agreement in principle that settles all matters in controversy between them. The Parties respectfully and jointly request that this Court grant the requested extension to allow the agreement to be finalized, settlement obligations to be met and a dismissal stipulation to be filed with the Court.

The Parties hereby stipulate that Plaintiff has until **January 5, 2018** to file its Opposition to the Motion.

Dated: December 28, 2017	MCDONALD CARANO LLP
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	/s/ Amanda M. Perach Craig A. Newby (Nevada Bar No. 8591) Amanda M. Perach (Nevada Bar No. 12399) 2300 W. Sahara Ave., Suite 1200 Las Vegas, NV 89102 Telephone: (702) 873-4100 Email: cnewby@mcdonaldcarano.com Email: aperach@mcdonaldcarano.com
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1	Dated: December 28, 2017	FOLEY & OAKES, PC
2		/s/ Daniel T. Foley
3		Daniel T. Foley (Nevada State Bar No.1078) 626 So. 8th Street
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12		Facsimile: (214) 635-1842
13		Attorneys for Defendant, Roller Clutch Tools, LLC
14		DRDER
	<u> </u>	AND LIK
15	IT IS SO ODDEDED	
15 16	IT IS SO ORDERED	
	IT IS SO ORDERED DATED this 29 day of December, 2017	Sha
16		Gloria M. Navarro, Chief Judge
16 17 18		Sha
16 17		Gloria M. Navarro, Chief Judge
16 17 18 19 20		Gloria M. Navarro, Chief Judge
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16 17 18 19 20 21 22		Gloria M. Navarro, Chief Judge
16 17 18 19 20 21 22 23		Gloria M. Navarro, Chief Judge
16 17 18 19 20 21 22 23 24		Gloria M. Navarro, Chief Judge
16 17 18 19 20 21 22 23 24 25		Gloria M. Navarro, Chief Judge
16 17 18 19 20 21 22 23 24 25 26		Gloria M. Navarro, Chief Judge
16 17 18 19 20 21 22 23 24 25		Gloria M. Navarro, Chief Judge

CERTIFICATE OF SERVICE 1 2 I HEREBY CERTIFY that I am an employee of McDonald Carano LLP, and that on December 28, 2017, I caused a true and correct copy of the foregoing STIPULATION 3 REGARDING EXTENSION OF TIME TO RESPOND TO DEFENDANT'S MOTION TO 4 5 **DISMISS** (First Request), to be served via the U.S. District Court's Notice of Electronic Filing ("NEF") in the above-captioned case to: 6 7 8 Daniel T. Foley (Nevada State Bar No.1078) 626 So. 8th Street 9 Las Vegas, NV 89101 Telephone: (702) 384-2070 Facsimile: (702) 384-2128 10 Email: Dan@foleyoakes.com 11 Eric W. Buether (to be admitted pro hac vice) Email: Eric.Buether@BJCIPLaw.com 12 Christopher M. Joe (to be admitted pro hac vice) Email: Chris.Joe@BJCIPLaw.com 13 Michael D. Ricketts (to be admitted pro hac vice) Email: Mickey.Ricketts@BJCIPLaw.com 14 BUETHER JOE & CARPENTER, LLC 1700 Pacific Avenue, Suite 4750 15 Dallas, TX 75201 (214) 466-1270 Telephone: 16 Facsimile: (214) 635-1842 17 Attorneys for Defendant, Roller Clutch Tools, LLC 18 19 20 /s/ Brian Grubb 4830-7947-4777, v. 7 21 22 23 24 25 26 27

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